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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

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COMPRESSSION TECHNOLOGY
SOLUTIONS LLC,

31 Plaintiff,

32 v.

33 EMC CORPORATION, NETAPP, INC., AND
34 QUANTUM CORP.,

35 Defendants.

36 Case No. 5:12-cv-01746-RMW

37 **STIPULATION AND [PROPOSED] ORDER
38 TO EXTEND TIME FOR INVALIDITY
39 CONTENTIONS AND DOCUMENTS
40 ACCOMPANYING INVALIDITY
41 CONTENTIONS**

42 Ctrm: Courtroom 6 - 4th Floor
43 Judge: Honorable Ronald M. Whyte

1 WHEREAS the Court issued a Scheduling Order on October 11, 2012 setting the dates
2 for discovery deadlines;

3 WHEREAS the current deadline for service of Invalidity Contentions and production of
4 Documents Accompanying Invalidity Contentions pursuant to Patent L.Rs. 3-3 and 3-4 is
5 November 26, 2012;

6 WHEREAS on September 17, 2012 the Defendants filed a motion for summary judgment
7 of invalidity;

8 WHEREAS on October 19, 2012 the Plaintiff filed a motion to stay the November 2,
9 2012 hearing on Defendants' motion for summary judgment;

10 WHEREAS on November 2, 2012 the Court heard oral arguments on Defendants' motion
11 for summary judgment and Plaintiff's motion to stay; and

12 WHEREAS the parties have stipulated, pursuant to Civil L.R. 6-2, to extend the time for
13 Defendants to serve Invalidity Contentions pursuant to Patent L.R. 3-3 and to produce
14 Documents Accompanying Invalidity Contentions pursuant to Patent L.R. 3-4 until 20 days after
15 the Court issues its ruling on Defendants' motion for summary judgment of invalidity;

16 NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, and request the
17 Court to order, as follows:

18 The deadline for Defendants to serve Invalidity Contentions and produce Documents
19 Accompanying Invalidity Contentions, pursuant to Patent L.Rs. 3-3 and 3-4, shall be stayed until
20 20 days after the Court's ruling on Defendants' motion for summary judgment of invalidity. All
21 dates following the disclosure of Invalidity Contentions shall be stayed pending adjudication of
22 Defendants' summary judgment motion.

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1 Dated: November 14, 2012

ROPS & GRAY

2 By: /s/ Khue V. Hoang
3 KHUE V. HOANG

4 Attorneys for Defendant
5 EMC CORPORATION

6 Dated: November 14, 2012

DURIE TANGRI LLP

7 By: /s/ Clement S. Roberts
8 CLEMENT S. ROBERTS

9 Attorneys for Defendant
10 QUANTUM CORP.

11 Dated: November 14, 2012

12 GOODWIN PROCTOR LLP

13 By: /s/ Gregory S. Bishop
14 GREGORY S. BISHOP

15 Attorneys for Defendant
16 NETAPP, INC.

17 Dated: November 14, 2012

18 SIMMONS BROWDER GIANARIS
19 ANGELIDES & BARNERD LLC

20 By: /s/ Paul A. Lesko
21 PAUL A. LESKO

22 Attorneys for Plaintiff
23 COMPRESSION TECHNOLOGY
24 SOLUTIONS, LLC

25 **IT IS SO ORDERED.**

26 DATED: November 19, 2012

27 
28 HON. RONALD M. WHYTE
UNITED STATES DISTRICT JUDGE

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Clement S. Roberts, attest that concurrence in the filing of this document has been obtained.

Dated: November 14, 2012

/s/ Clement S. Roberts

CLEMENT S. ROBERTS

CERTIFICATE OF SERVICE

I certify that all counsel of record is being served on November 14, 2012 with a copy of this document via the Court's CM/ECF system.

Dated: November 14, 2012

/s/ *Clement S. Roberts*

CLEMENT S. ROBERTS